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7 *Attorneys for Google LLC*

8 UNITED STATES DISTRICT COURT

9 NORTHERN DISTRICT OF CALIFORNIA

10 SAN FRANCISCO DIVISION

11 GOOGLE LLC,

12 Plaintiff,

13 vs.

14 SONOS, INC.,

15 Defendant.

CASE NO. 3:20-cv-06754-WHA

Related to CASE NO. 3:21-cv-07559-WHA

**DECLARATION OF NIMA HEFAZI IN  
SUPPORT OF GOOGLE LLC'S  
ADMINISTRATIVE MOTION TO SEAL  
PORTIONS OF ITS PATENT  
SHOWDOWN OPPOSITION TO  
SONOS'S MOTION TO STRIKE  
PORTIONS OF GOOGLE'S MOTION  
FOR SUMMARY JUDGMENT**

1 I, Nima Hefazi, declare and state as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to  
3 practice before this Court. I am of counsel at Quinn Emanuel Urquhart & Sullivan LLP representing  
4 Google LLC (“Google”) in this matter. I have personal knowledge of the matters set forth in this  
5 Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Google’s Administrative Motion to File Under  
7 Seal Portions of its Patent Showdown its Patent Showdown Opposition to Sonos’s Motion to Strike  
8 Portions of Google’s Motion for Summary Judgment (“Opposition”). If called as a witness, I could  
9 and would testify competently to the information contained herein.

10 3. Google seeks an order sealing the materials as listed below:

Document	Portions to Be Filed Under Seal	Designating Party
Google’s Opposition	Portions highlighted in green	Google
Exhibit 2	Portions highlighted in green	Google
Exhibit 6	Portions highlighted in green	Google
Exhibit 9	Portions highlighted in green	Google
Affidavit of N. Hefazi	Portions highlighted in green	Google

19 4. Google’s Opposition, Exhibits 2, 6, 9 and the Affidavit of N. Hefazi contain references  
20 to Google’s confidential business information and trade secrets, including details regarding source  
21 code, architecture, and technical operation of Google’s products and functionalities that Sonos accuses  
22 of infringement. The specifics of how these functionalities operate is confidential information that  
23 Google does not share publicly. Thus, public disclosure of such information could lead to competitive  
24 harm to Google as competitors could use these details regarding the architecture and functionality of  
25 Google’s products to gain a competitive advantage in the marketplace with respect to their competing  
26 products. I also understand that a less restrictive alternative than sealing these exhibits would not be  
27  
28

1 sufficient because the information sought to be sealed is Google's confidential business information  
2 and trade secrets but is necessary to Google's Opposition.

3 I declare under penalty of perjury under the laws of the United States of America that to the  
4 best of my knowledge the foregoing is true and correct. Executed on May 5, 2022, in Los Angeles,  
5 California.

6 DATED: May 6, 2022

7 By: /s/ Nima Hefazi  
8 Nima Hefazi

**ATTESTATION**

I, Charles K. Verhoeven, am the ECF user whose ID and password are being used to file the above Declaration. In compliance with Civil L.R. 5-1, I hereby attest that Nima Hefazi has concurred in the aforementioned filing.

DATED: May 5, 2022

/s/ Charles K. Verhoeven

Charles K. Verhoeven